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February 4, 2022

VIA ECF

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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Re: *ABG Intermediate Holdings 2, LLC and ABG-SPG ES, LLC v. Bolt Financial, Inc.*, 22-cv-00473 (LAK)

Dear Judge Kaplan:

We write on behalf of Plaintiffs in the above-captioned case. As discussed with Your Honor during the conference held on February 1, 2022, the Complaint in this matter was initially filed under seal in light of certain confidentiality provisions contained in the parties' agreements. At Your Honor's direction, we have conferred with counsel for Defendant Bolt Financial, Inc. regarding the need for continued sealing and the parties have agreed that the current Complaint should be filed publicly.

Accordingly, Plaintiffs respectfully request that the Court unseal the Complaint. We have enclosed a proposed order to that effect.

Thank you for your consideration of this matter.

Respectfully submitted,

MEMO ENDORSE

/s/ Nicholas A. Gravante, Jr.  
Nicholas A. Gravante, Jr.

cc: Counsel of Record

SO ORDERED

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LEWIS A. KAPLAN, USBJ

2/7/2022